

Personal Information Protection Policy

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This Personal Information Protection Policy ("Policy") applies to the online and offline services that CXA China and its affiliated companies ("We") provide to you in connection with our products through the Employee Benefits Online Platform. In the course providing our products and services to you (including but not limited to the service of health management, benefit selection, etc.), we may process personal information from you. This Personal Information Protection Policy is designed to explain how we collect, use, store, share and protect your personal information in the course providing products and services to you.

Please read this Policy carefully to fully understand all the contents of the Policy before using our products and services to make sure you have acknowledged the meaning of all contents, especially those contents in bold and its corresponding legal consequences, and on this basis to indicate "Agree" or "Disagree". By choosing the "Agree" button, you are deemed to have accepted "all contents of" this Personal Information Protection Policy. **By refusing to agree to this Policy you will not be able to use our online products and services that require relevant personal information; in this case, please refrain from providing any personal information without contacting us. Alternatively, you may also obtain information on relevant products or services through the "Contact Us" section of this Policy.**

If you use the services of a third party, the corresponding third-party service provider may process personal information directly from you in accordance with its own Personal Information Protection Policy/Privacy Policy, please read the personal information protection policy/privacy policy of the third-party service provider carefully. We do not guarantee or make any commitments to the personal information protection obligations and performance of the third-party service provider, but we will remind the third-party service provider to comply with the relevant legal and regulatory requirements by means of written statements.

1. Definitions

Unless otherwise stated, the definitions of terms referred to in this Policy are as follows.

- (1) "Affiliated Company" refers to a company or other form of entity that directly or indirectly controls or is controlled by or is under common direct or indirect control with CXA. "Control" means the ownership, directly or indirectly, of at least fifty percent of the voting rights or the right to exercise management rights of an entity.
- (2) "Personal information" refers to any kind of information related to an identified or identifiable natural person as electronically or otherwise recorded, excluding information that has been anonymized, including but not limited to name, date of birth, ID number, personal biometric recognition, address, contact information, correspondence records and content.

Sensitive personal information refers to personal information that, once leaked or illegally used, will easily lead to infringement of the human dignity or harm to the personal or property safety of a natural person, including biometric recognition, religious belief, specific identity,

medical and health, financial account, personal location tracking and other information of a natural person, as well as any personal information of a minor under the age of 14.

- (3) "De-identification" refers to the process in which any personal information is processed to the extent that it cannot identify a specific natural person without the help of additional information.
- (4) "Anonymization" refers to the process in which any personal information is processed to the extent that it cannot identify a specific natural person and cannot be restored to its original state.
- (5) "Deletion" refers to the act of removing personal information from the systems involved in the implementation of daily business functions so that it remains unretrievable and inaccessible.

2. How Do We Process Your Personal Information?

We will only process your personal information for the following purposes, and where we have already collected personal information from you for other purposes or where we will collect additional personal information from you, we will inform you in a reasonable manner and obtain your consent again before using it.

- (1) Purpose 1: To create your personal account and use its core functions on the Platform.

The scope of your personal information that may be collected: your name, gender, identification information, date of birth, telephone number, email address, corporate WeChat ID, city, company, department and position, entry day, employee number, marital status, health and medical information ("your basic information").

If you refuse to provide the above information, you may not be able to create your personal account and use the Platform.

- (2) Purpose 2: To recommend and introduce products and/or services to you when you use our websites, platforms, applications or other online services.

The scope of personal information that may be collected: your basic information, your preference of the products and/or services, browsing history and purchase intentions for products and/or services, **your health risk assessment (HRA) information.**

If you refuse to provide the above information, you may not be able to use the recommended services on the Platform.

- (3) Purpose 3: To sell products and/or services to you when you use our websites, platforms, applications or other online services.

The scope of personal information that may be collected: your basic information, your purchase intentions and orders for products and/or services (including product/service content, quantity, etc.), **contact address, identification information, image information, payment information, payment history for products or services.**

If you refuse to provide the above information, you may not be able to use the Online Benefits Mall.

- (4) Purpose 4: To design and develop employee benefits and wellness products, services and solutions.

The scope of personal information that may be collected: your basic information, your family members' names, gender, **identification information**, date of birth, telephone number, **marital status** ("your family members' basic information") .

If you refuse to provide the above information, you or your family members may not be able to use employee benefits and wellness products, services and solutions.

(5) Purpose 5: To provide you with services in connection with claims and acceptance of related insurance transactions.

The scope of personal information that may be collected: your basic information, **payment information, salary information**, your family members' basic information.

If you refuse to provide such information, you may not be able to use the services in connection with claims and acceptance of insurance.

(6) Purpose 6: To provide you with medical examination services.

The scope of personal information that may be collected: your basic information, your family members' basic information.

If you refuse to provide such information, you may not be able to use the medical examination service.

(7) Purpose 7: To conduct market research and customer satisfaction surveys.

The scope of personal information that may be collected: your basic information, your basic information, your purchase intentions and orders for products and/or services, your evaluation of services and products.

(8) Purpose 8: For our internal audit or fraud prevention monitoring.

The scope of personal information that may be collected: your basic information, your purchase intentions and orders for products and/or services.

In any case, if the information you provide contains other users' personal information, you have to ensure that you have obtained legal authorization before providing others' personal information.

2. Use of Information Collection Techniques

2.1 A Cookie is a specific identifier that recognizes your device and enables us to recommend personalized products and services to you. As technology develops and our products and services become more sophisticated, we may identify, collect and record your browsing habits, browsing information, login information, etc. through cookies or similar technology.

2.2 Most web browsers automatically turn on cookies. You can setup your browser settings to turn off cookies or refuse to open and access the relevant pages.

2.3 Some of our products/services are only available through the use of cookies or similar technologies. If you refuse to use them, you may not be able to use our products and/or services properly or get the best experience with our products and/or services, and there may also be some impact on the protection of your information and the security of your account.

3. How Do We Store and Protect Your Personal Information?

We will store and protect your personal information from loss, misuse, unauthorized access or disclosure, alteration or destruction by security measures and technical means (including identity identification, data encryption, access control, malicious code prevention and security auditing) in accordance with national standards.

Your personal information is stored on password-controlled servers **located in China** and access to it is restricted.

We will retain your personal information and your family members' personal information until the expiry of your employment contract with your employer, unless you request us to delete the information or unless otherwise required by laws, for example, the E-Commerce Law of the

People's Republic of China requires that information on goods and services and transactions be retained for a period of not less than three years from the date of completion of the transaction. We will delete or anonymize your personal information once it has exceeded the period.

In the unfortunate event of a personal information security incident, we will promptly inform you of the basic situation and possible impact of the security incident, the measures we have taken or will take to deal with it, suggestions for you to prevent and reduce the risk on your own, remedial measures for you, etc. in accordance with the requirements of laws and regulations. We will promptly inform you of the incident by pushing notification, sending emails/short messages, etc.; when it is difficult to inform personal information subjects individually, we will take reasonable and effective ways to make announcements. At the same time, we will also take the initiative to report on the disposal of personal information security incidents in accordance with the requirements of the regulatory authorities.

4. How Do We Share, Transfer or Publicly Disclose Your Personal Information?

4.1 Commitments of sharing and transferring: we will not share or transfer your personal information with or to any company, organization, and individual, except for the following:

- (1) With your express consent, we will share your personal information within the scope of your authorization with the third party you designated.
- (2) We may need to share your personal information with external parties in accordance with relevant laws and regulations or mandatory requirements of government authorities.
- (3) Subject to the purposes stated in this Personal Information Protection Policy, we may share your personal information with our affiliated companies so that we can make full use of their information technology, marketing and customer service resources to better store and protect your personal information, achieve our commitment to your data security, and better recommend and introduce various products and services to you.
- (4) We may share or transfer your personal information with our business partners for the purpose of conducting business or for the purposes described in "Process of Personal Information". We will inform you of the purpose of the sharing or transfer of personal information, the type of personal information, the type of recipient and the possible consequences, and obtain your authorized consent. If the content of the sharing or transfer includes sensitive personal information, we will inform you of the identity and data security capabilities of the recipient of the data and obtain your express consent. Our business partners include:
 - a) Your employer.
 - b) Third party service providers or partners.
 - c) User Authorized Parties. Public information such as your username is shared with third party service providers of your choice, events you participate in, etc. in accordance with your authorization.

4.2 Public Disclosure

We will only disclose your personal information publicly if

——with your express consent; or

——based on legal and regulatory requirements or relevant regulatory requirements: we may disclose your personal information where compelled by law or mandated by government authorities and where disclosure is necessary.

4.3 Exceptions to Sharing, Transfer and Public Disclosure.

You are fully aware that in accordance with applicable laws, we do not require your prior authorized consent for the sharing, transfer or public disclosure of your personal information where:

- directly related to national security, national defense security.
- directly related to public safety, public health, or vital public interest.
- directly related to the investigation, prosecution, trial and execution of sentences for crimes.
- for the purpose of safeguarding your life, property and other significant legitimate rights and interests, or those of others, but where it is difficult to obtain your consent.
- where the personal information collected is disclosed by you to the public at your own discretion.
- personal information is collected from information that is lawfully and publicly disclosed, for example: lawful news reports, government information disclosure and other sources.
- necessary to enter into and perform a contract at your request.
- necessary for maintaining the safe and stable operation of the products or services provided, for example: detecting and disposing of faults in products or services.
- other circumstances as stipulated by laws and regulations.

5. Your Rights and Choices

5.1 In accordance with the relevant laws and regulations of the People's Republic of China, we will take appropriate technical measures to ensure your rights to access, update, correct or delete your personal information. When you exercise your rights, we may require you to provide the appropriate identification to ensure the security of your personal information

5.2 You have the right to access, correct, delete, withdraw authorization, delete your account, make copies of your personal information, and file a complaint in accordance with the law.

——**Right of Access:** You can access your personal information you have provided to us through the [Online Benefits Platform - "My" Module].

——**Right of correction:** If you find that your personal information is incorrect or incomplete, you have the right to request us or yourself to correct or update the incorrect or incomplete information, provided that your identity is verified, and the correction does not affect the objectivity and accuracy of the information. Corrections to your personal information can be made through the “Contact Us” section of this policy.

—— **Right to delete:** If we collect, use, share, transfer or publicly disclose your personal information in violation of laws and regulations or the agreement with you, you have the right to ask us to delete it through the “Contact Us” section of this policy.

—— **Right of withdrawal:** If you refuse to receive commercial advertisements or marketing information sent by email, SMS, printed materials, etc. based on your personal information, or if you do not want us to share, transfer or publicly disclose your personal information, you can withdraw the relevant information through the “Contact Us” section of this policy.

——**Right to cancel:** You have the right to request the cancellation of your account information. If your identity is verified and the account meets the conditions for cancellation, we will cancel your account and delete or anonymize your personal information. Unless otherwise required by law or regulation, the account cancellation may result in the erasure of all your user data and account information, which cannot be recovered, and you may contact us for further details through the “Contact Us” section of this policy.

——**Right to make copies of your personal information:** You have the right to obtain a copy of your personal information and you may do so by contacting us through the “Contact Us” section of this policy.

5.3 In addition to your rights as set out above, if you have any questions, you can contact us through the “Contact Us” section of this policy or via the email address in this policy. We will then verify your identity and respond with an opinion or outcome within fifteen (15) working days of receiving your request.

6. How Do We Process Sensitive Personal Information and Protect Minors' Information?

6.1 Sensitive Personal Information

The personal information we collect includes your sensitive personal information. When collecting and using your sensitive personal information, we will strictly comply with relevant laws and regulations, and adopt strict security protection measures such as encryption and access control. We will not use your sensitive personal information for any other purposes beyond those described in this policy, or make any public disclosure or sell the information without your express consent.

6.2 Information About Minors

We regard individuals under the age of 18 as minors. We attach great importance to the protection of minors’ personal information, and in accordance with the Personal Information Protection Law of the People’s Republic of China and other relevant laws and regulations, we provide special protection for the personal information of minors under the age of 14.

——If you are a child under the age of 14, you must use our services under the guidance of your parents or other guardians. We will not actively collect your personal information without obtaining the explicit consent of your guardian. For your personal information collected with the consent of your guardian, we will only use or disclose such information as permitted by laws and regulations, with the explicit consent of your guardian, or as necessary for your protection.

——If you are a minor aged 14 or above but under 18, you are a person with limited capacity for civil conduct under Chinese law. Before collecting and using your personal information, we recommend that you obtain the consent of your guardian. In scenarios involving the processing of sensitive personal information or that may have a material impact on your rights and interests, we may require or verify that you have obtained the consent of your guardian. If your guardian does not consent to your use of our services or provision of information to us in accordance with this policy, please terminate your use of our services immediately and notify us promptly so that we can take appropriate measures.

——If you are the parent or guardian of a minor, please contact us through the channels listed in the "Contact Us" section if you have questions about the processing of information about a minor in your care.

7. Disclaimer of Liability to Third Parties

Please note that our online platform may access other web pages, applications or plug-ins ("other programs"), and if the other programs process your personal information and transfer it to a server that is not under our control, we will alert you through a pop-up window or other means when you first access the other program. We will endeavor to require the operators of such other programs to protect your personal information, but we are not liable for the process of personal information by such other programs and their operators. We recommend you read their Personal Information Protection Policy carefully and if you are aware of any risks associated with these third-party programs, we recommend you terminate the use to protect your rights.

8. Contact Us

If you have any questions, comments or suggestions regarding this Personal Information Protection Policy, you may contact our personal information protector by email at [cnprivacy@cxagroup.com], contact address: [3rd Floor, T STAR Zhishang Garden, No. 258 Yangzhai Road, Changning District, Shanghai].

In some cases, for the purpose of protecting the security of personal information, we may require you to provide a written request or prove your identity in other way. We will respond to your request as soon as we receive your feedback and verify your identity.

9. Revisions and Updates

We may revise and update this Personal Information Protection Policy from time to time; if we make material changes to the Policy, we will promptly post an updated version on our website. The revised and updated Policy will be effective from the date it posted, unless otherwise stated, the latest effective Policy will apply to all your personal information processed by us.